kxgn
GLENDIVE
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CORPORATION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20556

In the Matter of	)	
Amendment of Section 73.622	)	RM No. 9880
of the Commission's Rules	)	
Digital Television Table of Allotments	)	MM Docket No. _____

To: The Chief, Allocations Branch

PETITION FOR RULE MAKING

Glendive Broadcasting Corporation, licensee of commercial television station KXGN-TV, Glendive, Montana, hereby petitions for Federal Communications Commission ("FCC") for rule making to modify FCC's Digital Table of Allotments as described in Section 73.622 of the Commission's Rules.[1] KXGN-TV requests that the FCC substitute DTV Channel 10 in lieu of Channel 15 as its digital television allotment.

Adoption of the petition would enable station KXGN-TV to provide more service at a reduced cost if the FCC adopts this request. Television station KXGN-TV will apply for the allotted channel upon its approval.

[1] 47 C.F.R. § 73.622.

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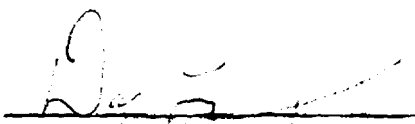
It is requested that the Commission adopt the Petition and approve the proposed modification in the request for KXGN-DT's channel allotment.

Respectfully submitted,



Glendive Broadcasting Corporation

October 27, 1999

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ENGINEERING STATEMENT
PETITION FOR RULE MAKING
SECTION 73.622 OF THE FCC RULES
TO CHANGE DTV CHANNEL
ON BEHALF OF
GLENDIVE BROADCASTING CORPORATION
KXGN-DT, GLENDIVE, MONTANA

OCTOBER 1999

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 28th day of October, 1999.

Notary Public

My Commission Expires: 2/28/2003

This engineering statement has been prepared on behalf of Glendive Broadcasting Corporation, licensee of Television Station KXGN-TV, Glendive, Montana. KXGN-TV is assigned NTSC Channel 5. It is proposed to change the current digital television channel allotment contained in Section 73.622 of the FCC Rules from UHF Channel 15 to VHF Channel 10 at the maximum VHF DT non-directional power of 30 kW.

A detailed analysis has been performed of the impact of this proposal on other authorized NTSC stations, DTV allotments listed in Table B[1] and other proposed DTV allotment changes. The analysis has been performed using the Federal Communications Commission OET Bulletin 69 dated July 2, 1997 and the FCC supplemental processing guidelines dated August 1998. The analysis was performed by using the FCC ("FLR") Longley-Rice model adapted for use for an INTEL computer. The results of this adapted FLR program has been compared to other known FCC studies and have been found to give comparable results.

Existing DTV Table of Allotments, Page B-33

DTV Channel	Effective Radiated Power	Height Above Average Terrain
15	125.6 kW	152 meters
	Proposed DTV Facilities	
10	30 kW	152 meters

As shown in Table 1, modifying the DTV allotment for KXGN-DT would not result in additional interference in excess of that permitted by the FCC's Rules. Further an examination of

[1] In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service", MM Docket No. 87-268, Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order (FCC 98-24), 2/12/98.

interference to co-channel low power television stations and translators has been performed. No co-channel stations were found to be within 50 km of the KXGN-TV site. Therefore, it is believed that the grant of this request will be compatible in accordance with the FCC Rules with current proposed and licensed stations.

COHEN, DIPPELL AND EVERIST, P. C.

TABLE 1
INTERFERENCE SUMMARY
KXGN-DT, CHANNEL 10, GLENDIVE, MONTANA
OCTOBER 1999

A study of predicted interference by the proposed KXGN-DT service has been performed using a version of the Longley-Rice program as described in OET Bulletin No. 69 (July 2, 1997) and the Public Notice, "Additional Application Processing Guidelines for Digital Television (DTV)" (August 1998). The FCC's FORTRAN-77 code was modified only to the extent necessary (primarily input/output handling) for the program to run on a Windows98/Intel platform. Comparison of service/interference areas and populations indicates that this model closely matches the FCC's evaluation program. Best efforts have been made to use data and calculations identical to the FCC's program. Any slight differences are attributable to compiler, operating system and/or processor characteristics. The effect of any variance in calculated population values versus the FCC's program is minimized when differencing a given model's results, e.g., new interference equals total interference less baseline interference. The effect is further reduced for ratios of calculated population values, e.g., incremental population affected as a percent of total population served. The model employs the Longley-Rice propagation methodology and evaluates in grid cells of approximately 4 km^2 using 3-second terrain data sampled approximately every 0.1 km at one degree azimuth intervals with 1990 census centroids.

Baseline KXGN-DT: Allotment, Channel 15, 125.6 kW, 152 M HAAT
N 47°03' 15", W 104° 40' 45"
(NAD-27)

Proposed Change: Channel 10, 30 kW, 152 M HAAT
N 47° 03' 15", W 104°40' 45"
(NAD-27)

Affected Station	Distance/Bearing	Interference (% of Population Served) Baseline	New
KMOT(TV) Ch. 10 Minot, ND Licensed 214 kW, 733 M AMSL	283.7/61.6°	0.0	1.6
		Appendix B	0.0% new interference

Studied with an omni-directional pattern for worst-case scenario.